



GEORGETOWN LAW

David A. Super
Professor of Law

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Federal Communications Commission
Office of the Secretary

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: WC Docket No. 11-42; WC Docket No. 03-109; CC Docket No. 96-45

Dear Ms. Dortch:

I appreciate the opportunity to comment on the important issue of life-line telephones for low-income people. I am a professor at Georgetown University Law Center, specializing in anti-poverty law. My articles on federal, state, and local programs serving low-income people appear in many of the nation's leading legal journals, including the *California Law Review*, the *Columbia Law Review*, the *Cornell Law Review*, the *Harvard Law Review*, the *NYU Law Review*, the *University of Pennsylvania Law Review*, and the *Yale Law Journal*. Prior to becoming a professor, I served as general counsel at the Center on Budget and Policy Priorities, a non-profit, non-partisan research and analysis organization, where I specialized in what is now the Supplemental Nutrition Assistance Program (SNAP, formerly food stamps), Medicaid, Supplemental Security Income (SSI), Temporary Assistance to Needy Families (TANF), and other programs providing basic assistance to low-income people. And prior to my work at the Center, I worked directly with low-income people in Pennsylvania and Michigan.

The availability of life-line cellular telephone service is extremely important to low-income people for many reasons, most of which I assume other commentators have addressed. I would like to focus on two important ways in which life-line service would complement and advance other important federal policies. First, it would support the on-going effort to promote work, rather than public assistance, as the primary means of support for low-income people. And second, it would facilitate sweeping changes in the way federal anti-poverty programs, such as SNAP, Medicaid, and the new health care subsidies under the Patient Protection and Affordable Care Act (PPACA, commonly known as health care reform) are being administered.

Promoting Employment Among Low-Income People

The central theme of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), Public Law No. 104-193, was moving low-income people from reliance on cash welfare payments to greater self-sufficiency in the workplace. This theme had been

echoed in previous legislation, including the Family Support Act of 1988, Public Law No. 100-485, and in numerous rules and other executive actions. Congress sought to accelerate this movement in the Deficit Reduction Act of 2005, Public Law No. 109-171, by increasing pressure on states to reduce their cash assistance roles and to require work from the remaining recipients. The current Administration has launched several initiatives to promote employment by low-income people. As a result of PRWORA and state policies, the availability of cash assistance has been sharply curtailed with short time limits and other policies. As a result, the families of low-skilled workers who are unable to secure employment often lack any alternative source of income and face severe hardship.

The movement of low-income families from welfare to work has faced several widely acknowledged obstacles. One of these is employers' reluctance to provide benefits to relatively unskilled and inexperienced workers, including many of those that had received welfare until recently. Thus, employers offer far less than full-time work to many low-income workers. As the low-skilled labor market comes increasingly to be dominated by contingent employment, this pattern is likely to become increasingly pronounced. Because many of these jobs offer wages at or near the federal minimum wage, bread-winners must work multiple part-time jobs to support their families even at a bare subsistence level. Coordinating their schedules on these various jobs often requires frequent telephone calls. The inability to receive timely a call from an employer can mean the loss of an opportunity to work a shift that has become available, potentially costing a low-income family a significant fraction of its weekly income. Absent lifeline telephone service, many low-income people will be forced to depend on phones with expensive purchased minutes, supplemented by getting messages left on the phones of friends with land-lines or less limited cellphones. The time required to retrieve and act on these messages may be crucial, causing employers to offer work to other employees. In addition, low-skilled workers often are caught between one employer, who wants them to stay and work over-time, and another, who expects them to arrive for work after the worker's regular shift at the first job ended. Balancing the two employers, both of which are indispensable to the family's economic stability, often requires considerable back-and-forth negotiation or calls to other employees to secure last-minute replacements. Arrangements depending on friends' telephones are particularly unlikely to suffice to make these accommodations when the workers are already on the job site.

Another obstacle to employment is the difficulty low-skilled workers have in finding any employment at all. This obviously is a particularly serious problem today, with persistently high unemployment, as better-skilled and more experienced workers out-compete them for low-skilled jobs. Even in better times, however, economists and sociologists have documented a huge imbalance between the number of people seeking low-skilled employment and the number of positions available. For example, at the height of the economic boom of the 1990s, Harvard Professor Katherine Newman found that each unskilled job opening in Harlem typically resulted in a deluge of eager, even frantic, applicants. Katherine S. Newman, *No Shame in My Game: The Working Poor in the Inner City* (Knopf 1999). In this intensely competitive job market, with little to differentiate themselves from other applicants, low-skilled workers must depend on their responsiveness both to impress prospective employers and to seize opportunities for interviews

that may be offered at the last minute. If forced to rely on messages left with friends, many low-skilled workers will be unable to respond quickly enough to secure scarce interview slots.

In addition, research suggests that employers are leery of hiring people who seem too impoverished, even for low-skilled jobs. Apparently many consciously or unconsciously equate poverty with sloppiness. Programs providing interview clothes and cosmetic dental work to low-income people seeking employment have proven impressive successes. Not having one's own telephone in this age clearly marks someone as extremely poor and is likely to make her or him unattractive to the employers she or he vitally needs.

Even when low-skilled workers obtain employment, retaining work is often a major challenge. Knowing that a large pool of similarly-skilled workers is available, many employers are quick to fire workers for absenteeism or tardiness. Yet dependence on public transit systems prone to delays and on chaotic child care arrangements make perfect punctuality and attendance impossible. Having a mobile telephone with which to call the employer as soon as a delay or absence becomes probable may moderate the employer's irritation and make the worker appear concerned and conscientious. In addition, workers without their own telephones, or with exhausted minutes, may need to borrow their employers' telephone or those of co-workers to communicate with child care providers, car pools, and the like. This need to borrow is much greater now that pay telephones have largely disappeared from most public spaces. Even if this is done with permission, it may cause irritation and make the worker seem unprofessional or uncommitted to the workplace. This can place the worker first in line for lay-offs and last in line for promotions despite solid and diligent work.

Finally, the lack of reliable, affordable child care is a persistent barrier to employment for low-income people. Federal and state subsidy programs have funding to serve only a small fraction of those in need. At best, they may cover the first few months that a former welfare recipient is in the work force, terminating benefits while the new worker is still making much less than the federal poverty level. Many states have closed the waiting lists for these programs because the wait is so long that the children of people signing up today would no longer need care by the time they cleared the list. Even when subsidies are available, states seeking to stretch their funds to serve more people often provide extremely parsimonious subsidies. Purchasing child care with inadequate or no subsidies forces low-income workers to make difficult compromises. Child care centers, even bad ones, often are unaffordable. The result is a resort to various informal care arrangements, typically neighbors who take in several children each day. Because these providers are so poorly compensated, and are not professionals, they commonly are unwilling to tolerate sick children or children who are acting out on a particular day. They expect to be able to call the parent and demand that she or he pick up the child in short order. Without lifeline telephone service, many low-wage workers cannot assure prospective child care providers that they will be responsive in this way and may be unable to secure care. In addition, when their child's health is borderline, they may have to stay home from work, and miss crucial hours of employment; with a telephone, they could go to work planning to leave early to retrieve the child if her or his condition worsens. Even more importantly, family day-care providers often are unable to take an injured or seriously ill child to the doctor because they lack anyone to watch

the other children in their care. Without reliable telephone service, the parent may be unaware of their child's need for medical attention, delaying care for hours. The frustration of having a sick or injured child but being unable to reach the parent could prompt the provider to terminate services to the parent. Loss of child care arrangements is one of the leading causes of loss of employment in the low-wage workforce.

Facilitating Changes in the Administration of Federal Anti-Poverty Programs

For most of their histories, administration of anti-poverty programs in this country centered on a social worker or eligibility worker based in a welfare office. Although the role of the eligibility worker changed significantly over time – at some times providing wide-ranging interventions into applicants' and recipients' lives, at other times functioning more as an auditor – the assigned eligibility worker remained the fulcrum of program administration across the decades. To obtain benefits, to report changes in their status, or to comply with periodic eligibility review requirements, a low-income individual or family would go to the welfare office, meet with their assigned eligibility worker, fill out application and review forms, and provide that eligibility worker with documentation of their income, living expenses, and other relevant circumstances.

That model of program administration is rapidly disappearing. It began to erode as the appearance of new technology enticed some adventurous states to seek greater efficiencies through automated administration. To avoid payment errors that result from over-worked eligibility workers neglecting to act timely on information recipients had provided, states established centralized call centers to take recipients' reports of their changes. To make better use of staff in smaller, rural offices with relatively modest caseloads, states are adopting "statewide caseloads" under which case records are electronic and work is routed to any available eligibility worker, regardless of where in the state she or he may be based. These eligibility workers depend on telephone contacts with applicants and recipients to resolve questions about the case; applicants and recipients can no longer visit an eligibility workers in person because the person handling their case may be on the other side of the state. An increasing number of states, led by Florida and Texas, have closed many of their local human services offices and have adopted business models that discourage or disallow direct, in-person contact with eligibility workers even when an applicant or recipient journeys to one of the few offices that do remain. These states handle most or all eligibility determination functions through call centers in which whoever answers the telephone has access to the records for the applicant or recipient and can make changes as indicated. USDA has promoted reliance on these call centers in SNAP and has funded state exchanges to share ideas about best practices for expanding their roles in program administration.

Both to avoid making applicants and recipients miss time from their jobs and to more efficiently use agency staff, many states now are relying almost entirely upon telephone interviews to establish the eligibility of applicants and recipients. These often are scheduled very approximately, requiring the applicant or recipient to sit by the telephone for an hour or more to await a call. If the line is busy or does not answer when the state agency calls, the low-income household's benefits may be denied for failure to submit to the interview. *See, e.g.*, 7 C.F.R. § 273.2(e) (mandating interviews for SNAP). Public pay telephones – even if the recipient can

find one and it accepts incoming calls – or friends' telephones are not practical for these purposes. With many more low-income people working, and many of their employers unwilling to allow them to conduct personal business on company time, applicants and recipients often need to reach public agencies to change the required interview to a time when the applicant or recipient is not scheduled to work.

States also are relying increasingly on on-line applications for benefits and on-line systems for recipients seeking renewal of their benefits at the end of certification periods. USDA has promoted these systems in SNAP; the Centers for Medicare and Medicaid Services of the U.S. Department of Health and Human Services anticipates relying almost entirely on web portals to administer the health insurance subsidies under the Patient Protection and Affordable Care Act ("health care reform") as well as the continuing Medicaid and Children's Health Insurance Program (CHIP) that will complement those premium subsidies. Many low-income people who need and qualify for benefits, however, either lack access to computers and the internet or lack the skills to navigate an on-line application. Others may be unable to navigate on-line systems because of physical disabilities (such as vision impairments or lack of manual dexterity) or mental or intellectual disabilities. Applicants and recipients may rely upon telephones to learn where they may obtain public access to the internet, to obtain guidance in navigating on-line applications or interpreting difficult terms in those applications, and to obtain paper copies of applications if they cannot, for whatever reason, apply or renew their eligibility on-line. When Georgia recently required all SNAP recipients to renew their eligibility on-line, with only its call center permitted to distribute paper renewal applications, large numbers of households were unable to reach the call center in time to get paper forms and were cut off from benefits. See Alexis Stevens & Joel Anderson, *Hundreds lose food stamps with no warning*, Atlanta Journal-Constitution, Oct. 13, 2011; <http://www.ajc.com/news/cobb/hundreds-lose-food-stamps-1200370.html>. For persons with disabilities, the availability of paper applications were the accommodations required under the Americans with Disabilities Act and section 504 of the Rehabilitation Act, 29 U.S.C. § 794. The lack of sufficient telephone service effectively means that some of these people with disabilities cannot receive the accommodation to which federal law and regulations entitle them.

The increased emphasis on work requirements in TANF, SNAP, and other programs serving low-income people requires applicants and recipients to be able to receive communications about meetings, trainings, interviews, and work assignments on short notice; if the state agency or its contractor sends written notification at all, that notice often arrives after the date of the required activity. Failure to attend those activities can result in sanctions for the low-income people, often including the termination of assistance to all members of the family.

Applicants and recipients that cannot readily receive and respond to these various kinds of inquiries, and who cannot effectively call administering agencies when experiencing difficulties with their benefits, will be at a serious disadvantage. Automated systems are programmed to close applications after ten days from when a request for documentation is made, but applicants can avoid this if they can reach an eligibility worker and explain their inability to produce what was requested. See, e.g., 7 C.F.R. § 273.2(d)(1), (f)(5). Automated systems also terminate low-

income households' benefits under SNAP and some other programs at the end of the pre-determined "certification period" unless the household has successfully completed the recertification process. *See, e.g.*, 7 U.S.C. § 2020(e)(4) (requiring new determinations of eligibility for SNAP households that have reached the end of their certification periods). Households that do not timely report changes in circumstances may face prosecution or administrative disqualification for fraud. *See, e.g.*, 7 U.S.C. § 2015(b) (SNAP). For the many low-income people receiving subsistence benefits precisely because their illiteracy or marginally literacy prevents them from holding jobs that pay well, submission of written reports is not a viable option. The ability to report by telephone is vital to the household's continued eligibility, to the state's keeping its error rate down (*see* 7 U.S.C. § 2025(c) (imposing fiscal penalties on states with high SNAP error rates), and to the federal priority of ensuring accurate targeting of benefits to those eligible.

Here again, the disappearance of public pay telephones deprives low-income people of the fall-back communications strategy on which prior generations relied. Federal regulations historically have required state agencies administering federal public benefit programs to provide toll-free numbers that applicants and recipients may call for various purposes. *See, e.g.*, 7 C.F.R. § 273.13(a)(2) (SNAP notices). These regulations have limited value now for households dependent on cellular telephones, who use up minutes even when calling these numbers. In practice, even basic communication functions – reporting changes in circumstances, requesting application forms, arranging application interviews, and the like – are likely to require large numbers of minutes because many states' call centers have grossly insufficient numbers of lines and eligibility workers to cope with the volume of transactions assigned to them. This is particularly true at the beginning of months, when recipients whose benefits were suspended or terminated for that month call to try to learn the reason and correct the situation. But even at other times of the month, getting through to call centers can be extremely difficult. The continuing weak economy and rising numbers of people in poverty have contributed to swelling demand for Medicaid, SNAP, and other basic public benefit programs. Participation in SNAP is now well over twice the level of the late 1990s. The same weakness in the economy, however, has reduced state revenues and forced broad cuts in public services and workforces. As a result, states have shrunk or, at best, frozen the staffing and number of lines at their call centers and remaining local human services offices just at the time demand is rising. The result is long waiting times – in some states routinely exceeding one hour – and telephone systems that lack the capacity even to put many callers on hold, requiring numerous call backs. The attached log documents the efforts of an advocate in Florida to reach that state's call center with a Medicaid concern: after more than one hundred calls from the 12th to the 27th of last month, the advocate was unable to reach a state employee on the Department of Children and Families' line. The calls required in this unsuccessful effort – to say nothing of the additional calls needed actually to get through – would exhaust many low-income people's monthly cellphone minutes and the willingness of their friends to allow them to borrow a telephone. Reports from other states suggest that this experience is sadly all too typical.

One central requirement of public benefit programs is that they make "fair hearings" available to applicants and recipients who disagree with actions affecting their access to benefits. In *Goldberg v. Kelly*, 397 U.S. 254 (1970), the U.S. Supreme Court held that such pre-depriva-

tion hearings were constitutionally required under the Due Process Clauses of the Fifth and Fourteenth Amendments. Congress repeatedly has endorsed this requirement as well. *See, e.g.*, 7 U.S.C. § 2020(e)(10) (SNAP); 42 U.S.C. § 1396a(a)(4) (Medicaid). Although fair hearings traditionally were held in conference rooms in local welfare offices by traveling hearing officers, new technology and budgetary pressures driving states to want to stop paying for employee travel have caused states to rely increasingly on telephonic hearings. Some states' unemployment compensation systems now conduct almost all of their hearings by telephone; state TANF, SNAP, and Medicaid programs are moving in that direction as well. Simple hearings commonly last thirty minutes; those addressing more complicated issues can take much longer. Moreover, even where the actual hearing is still conducted in person, many states rely primarily on telephone systems for applicants and recipients to request hearings; these systems may have extensive waiting times. Many low-income people will be unable to afford sufficient minutes on either a cellular telephone or a pay telephone (if they can find one) to request a hearing, much less to participate in one once it has been scheduled. Thus, applicants and recipients lacking lifeline telephone service with sufficient minutes will be unable to exercise the due process rights they formally possess in public benefit programs.

A related set of federal policies relate to the upbringing of children whose parents have separated or divorced. The traditional arrangement in these cases was to assign sole custody to the mother and to pursue the father for child support. Increasingly, however, federal policy has sought to maintain both parents' involvement with their children. This reflects, in part, the experience that non-custodial parents involved in the lives of their children are far more reliable payors of child support than those whose only relationship with their children is check-writing. It also reflects child development research showing better outcomes – better performance in school, less risk-taking and anti-social behavior, etc. – when the non-custodial parent actively engages in the child's life as a mentor and part-time care-giver.

This requires the primary custodial parent to interact far more extensively with her or his ex-partner to arrange the transfer of the child for visitation. Failure to do so can be detrimental to the child, can jeopardize child support payments on which the custodial parent depends to provide for the child, can violate court orders on visitation and shared custody, and can put the low-income parent at risk of losing custody of the child, a devastating, heart-breaking event. Yet a low-income custodial parent without a cellular telephone, or whose minutes have expired, is unlikely to be able to meet the demands of this coordination and avoid potentially disruptive failures. With both parents often working, and with low-income parents often relying on undependable public transportation or working at jobs where they cannot refuse unscheduled overtime, the ability to communicate about changes in plans at the last minute is vital. Access to a cellular telephone can prevent a child from being stranded when her or his parents fail to communicate and can avoid a costly and disruptive court hearing to revisit custody and support arrangements.

Conclusion

For all of these reasons, lifeline cellular telephone service is vital to the well-being of low-income people and the effectuation of important federal policies underlying programs serv-

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ing low-income individuals and families. Without the opportunities to communicate, coordinate, and comply with program requirements that lifeline service would provide, numerous low-income families would experience serious hardship and the important policies of these programs would be frustrated. Any arbitrarily low limit on the number of minutes of service available would jeopardize these purposes: just waiting to get through to public agencies could consume large numbers of minutes. The variety of entities that low-income people need to call – several agencies operating public programs (and often several distinct entities within those agencies), their employment and training or child support enforcement contractors, current and prospective employers, non-custodial parents of their children, regular and fall-back child care providers, health care providers, co-workers with whom they need to swap shifts, etc., any system restricting those with whom low-income people could communicate would be difficult to administer without undermining the core purposes of lifeline service. On the other hand, some high-end features commonly available on mobile communications seem far less essential.

I appreciate the opportunity to provide this information on the most important matter before the Commission. I would be pleased to answer any questions that the Commissioners or the staff of the Commission might have.

Sincerely yours,



David A. Super
Professor of Law

Calls to DCF Call Center

Re: Z[REDACTED]

SSN: [REDACTED]

DOB: [REDACTED]

Date	Time call placed	Outcome
10/12/2011	1:59pm	immediate recording due to high call volume try call again later & it disconnected
	2:01pm	immediate recording due to high call volume try call again later & it disconnected
	2:04pm	immediate recording due to high call volume try call again later & it disconnected
	2:05pm	immediate recording due to high call volume try call again later & it disconnected
	2:06pm	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 2:10pm
	2:11pm	immediate recording due to high call volume try call again later & it disconnected
	2:27pm	immediate recording due to high call volume try call again later & it disconnected
	2:49pm	immediate recording due to high call volume try call again later & it disconnected
	2:56pm	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 3:00pm
	3:02pm	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 3:06pm
	3:24pm	immediate recording due to high call volume try call again later & it disconnected
	3:45pm	immediate recording due to high call volume try call again later & it disconnected
	4:08pm	immediate recording due to high call volume try call again later & it disconnected
	4:19pm	immediate recording due to high call volume try call again later & it disconnected
	4:25pm	immediate recording due to high call volume try call again later & it disconnected
	4:31pm	immediate recording due to high call volume try call again later & it disconnected
10/13/2011	8:55am	immediate recording due to high call volume try call again later & it disconnected

	8:57pm	immediate recording due to high call volume try call again later & it disconnected
	9:05am	immediate recording due to high call volume try call again later & it disconnected
	9:10am	immediate recording due to high call volume try call again later & it disconnected
	9:17am	immediate recording due to high call volume try call again later & it disconnected
	9:34am*from my cell	immediate recording due to high call volume try call again later & it disconnected
	9:41am*from my cell	immediate recording due to high call volume try call again later & it disconnected
	12:01pm*from my cell	immediate recording due to high call volume try call again later & it disconnected
	12:07pm*from my cell	immediate recording due to high call volume try call again later & it disconnected
	12:10pm*from my cell	immediate recording due to high call volume try call again later & it disconnected
	1:52pm	immediate recording due to high call volume try call again later & it disconnected
	2:10pm	immediate recording due to high call volume try call again later & it disconnected
	2:31pm	immediate recording due to high call volume try call again later & it disconnected
	3:01pm	immediate recording due to high call volume try call again later & it disconnected
	3:16pm	immediate recording due to high call volume try call again later & it disconnected
	3:27pm	immediate recording due to high call volume try call again later & it disconnected
	4:03pm	immediate recording due to high call volume try call again later & it disconnected
	4:27pm	immediate recording due to high call volume try call again later & it disconnected
10/14/2011	9:17am	immediate recording due to high call volume try call again later & it disconnected
	9:39am	immediate recording due to high call volume try call again later & it disconnected
	10:01am	immediate recording due to high call volume try call again later & it disconnected
	10:20am	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 10:24am
	11:13am	immediate recording due to high call volume try call again later & it disconnected

	11:52am	immediate recording due to high call volume try call again later & it disconnected
	12:01pm	immediate recording due to high call volume try call again later & it disconnected
	1:25pm	immediate recording due to high call volume try call again later & it disconnected
	1:29pm	immediate recording due to high call volume try call again later & it disconnected
	1:32pm	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 1:36pm
	1:39pm	immediate recording due to high call volume try call again later & it disconnected
	1:42pm	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 1:45pm
	1:54pm	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 1:57pm
	2:17pm	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 2:21pm
	2:26pm	immediate recording due to high call volume try call again later & it disconnected
	3:46pm	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 3:49pm
	4:03pm	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 4:06pm
	4:15pm	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 4:20pm
10/17/2011	8:34am	immediate recording due to high call volume try call again later & it disconnected
	8:36am	immediate recording due to high call volume try call again later & it disconnected
	8:45am	reached the automated system, went through the prompts selected "0" to speak to an operator, then

		received recording due to high call volume try call again later & it disconnected at 8:49am
	9:40am	immediate recording due to high call volume try call again later & it disconnected
	9:53am	immediate recording due to high call volume try call again later & it disconnected
	10:06am	immediate recording due to high call volume try call again later & it disconnected
	10:25am	Reached the automated system, went through the prompts selected "0" to speak to an operator, sat on hold from 10:28am – 10:49am when I was disconnected – no recording or anything.
	10:58am	immediate recording due to high call volume try call again later & it disconnected
	11:12am	immediate recording due to high call volume try call again later & it disconnected
	11:30am	Reached the automated system, went through the prompts selected "0" to speak to an operator, I was placed on hold at 11:34am. I had to hang up at 11:59am because I had another call.
	1:15pm	immediate recording due to high call volume try call again later & it disconnected
	2:50pm	immediate recording due to high call volume try call again later & it disconnected
	2:59pm	immediate recording due to high call volume try call again later & it disconnected
	3:50pm	immediate recording due to high call volume try call again later & it disconnected
	4:38pm	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 4:43pm
10/18/2011	8:35am	immediate recording due to high call volume try call again later & it disconnected
	8:41am	immediate recording due to high call volume try call again later & it disconnected
	8:55am	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 8:59am
	9:33am	immediate recording due to high call volume try call again later & it disconnected
	10:25am	immediate recording due to high call volume try call again later & it disconnected
	10:38am	immediate recording due to high call volume try call again later & it disconnected

	11:39am	immediate recording due to high call volume try call again later & it disconnected
	11:47am	immediate recording due to high call volume try call again later & it disconnected
	12:02pm	immediate recording due to high call volume try call again later & it disconnected
	12:17pm	immediate recording due to high call volume try call again later & it disconnected
	1:44pm	immediate recording due to high call volume try call again later & it disconnected
	2:42pm	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 2:46pm
	3:24pm	immediate recording due to high call volume try call again later & it disconnected
	3:58pm	immediate recording due to high call volume try call again later & it disconnected
	4:04pm	immediate recording due to high call volume try call again later & it disconnected
	4:10pm	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 4:13pm
	4:13pm	immediate recording due to high call volume try call again later & it disconnected
10/19/2011	8:25am	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 8:29am
	9:02am	immediate recording due to high call volume try call again later & it disconnected
	9:04am	immediate recording due to high call volume try call again later & it disconnected
	9:07am	immediate recording due to high call volume try call again later & it disconnected
	9:25am	immediate recording due to high call volume try call again later & it disconnected
	9:51am	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 9:56am
	10:27am	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 10:31am

	10:32am	immediate recording due to high call volume try call again later & it disconnected
	11:01am	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 11:04am
	2:13pm	immediate recording due to high call volume try call again later & it disconnected
	2:38pm	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 2:41pm
	3:00pm	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 3:04pm
	3:09pm	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 3:12pm
	3:24pm	immediate recording due to high call volume try call again later & it disconnected
	3:38pm	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 3:42pm
	3:54pm	immediate recording due to high call volume try call again later & it disconnected
10/20/2011	8:30am	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 8:34am
	8:48am	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 8:52am
	9:21am	immediate recording due to high call volume try call again later & it disconnected
	9:27am	Reached the automated system, went through the prompts selected "0" to speak to an operator, then placed on hold at 9:31am and it cut me off at 9:47am - no message or anything.
	12:52pm	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 1:08pm - no

		message or anything.
	1:11pm	immediate recording due to high call volume try call again later & it disconnected
	2:25pm	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 2:30pm
	2:55pm	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 2:59pm
	3:49pm	immediate recording due to high call volume try call again later & it disconnected
	4:12pm	immediate recording due to high call volume try call again later & it disconnected
10/21/2011	8:22am	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 8:27am
	10:22am	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 10:28am
	1:47pm	immediate recording due to high call volume try call again later & it disconnected
	1:52pm	immediate recording due to high call volume try call again later & it disconnected
	2:50pm	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 2:54pm
	2:59pm	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 3:02pm
10/24/2011	10:10am	immediate recording due to high call volume try call again later & it disconnected
	12:05pm	immediate recording due to high call volume try call again later & it disconnected
	2:03pm	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 2:07pm
	3:16pm	immediate recording due to high call volume try call again later & it disconnected
	3:33pm	immediate recording due to high call volume try

		call again later & it disconnected
	4:12pm	immediate recording due to high call volume try call again later & it disconnected
10/25/2011	10:43am	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 10:47am
	11:39am	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 11:43am
	12:40pm	immediate recording due to high call volume try call again later & it disconnected
10/26/2011	1:25pm	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 1:30pm
	1:36pm	immediate recording due to high call volume try call again later & it disconnected
	1:50pm	immediate recording due to high call volume try call again later & it disconnected
	2:01pm	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 2:05pm
	2:17pm	immediate recording due to high call volume try call again later & it disconnected
	2:34pm	immediate recording due to high call volume try call again later & it disconnected
	2:50pm	immediate recording due to high call volume try call again later & it disconnected
	2:54pm	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 2:57pm
	3:29pm	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 3:34pm
	4:16pm	Reached the automated system, it started talking and just randomly disconnected in the middle of the automated speech at 4:18pm – never got to the prompts.
10/27/2011	8:42am	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call

		again later & it disconnected at 8:48am
	9:04am	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 9:07am
	10:16am	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 10:21am
	12:19pm	reached the automated system, went through the prompts selected "0" to speak to an operator, then received recording due to high call volume try call again later & it disconnected at 12:22pm
	12:54pm	immediate recording due to high call volume try call again later & it disconnected

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